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DRAFT EPA Region 9 FY17 Small ~~Public~~ Drinking Water System Action Plan

(Version 11/10/2016)

Introduction

Under the Safe Drinking Water Act (SDWA), small community drinking water systems (PWSs) serve no more than 10,000 people and very small systems serve no more than 3,300 people. Across EPA Region 9, there are 4,210 PWSs serving over 52 million people, 3,940 of which are small and serve 3.8 million people. Of the small systems, 3,325 are very small and serve 1.62 million people. The majority of these small or very small systems are in California (60%) and Arizona (20%).

Small systems, serving many of the Region's low-income and disproportionately overburdened communities, often lack sufficient resources and capacity to assure consistent SDWA compliance.¹ This Small ~~Public~~ Drinking Water System Action Plan (Plan) recognizes the critical need and urgency to improve the safety of public drinking water supplied to residents, school children and tribal members in these small communities, and builds on ongoing work of EPA's National Drinking Water Action Plan and Environmental Justice 2020 Action Agenda. Specifically, this Plan will focus on reducing exposure to two contaminants with long-term health effects: arsenic and lead. Arsenic is found in the drinking water of many parts of our southwestern states and tribes, and exceedances of the federal Maximum Contaminant Level (MCL) for arsenic represent the number one health-based SDWA violations in the Region. Strengthening protection against lead in drinking water is an EPA national priority.

The four objectives under this Plan are:

OBJECTIVE I: Ensure Small Systems Comply with EPA's Arsenic Standard

OBJECTIVE II: Reduce Exposure to Lead in Small Systems' Drinking Water Supply

OBJECTIVE III: Improve Access to Safe Drinking Water in Schools

OBJECTIVE IV: Improve Access to Safe Drinking Water in Tribal Communities

To achieve sustainable results, Region 9 will enhance oversight of states, step up direct enforcement, provide financial incentives and technical assistance through primacy agencies and in tribal lands, and engage regulatory partners and stakeholders. To ensure consistent outreach to share results, outreach efforts are an integral part of every objective's performance measures.

The Plan will function as a living document, to be regularly updated to reflect new information and input. In addition, the Region will conduct a semiannual review to assess the effectiveness of the Plan and make adjustments as appropriate.

OBJECTIVE I: Ensure Small Systems Comply with EPA's Arsenic Standard

Naturally occurring arsenic appears in many drinking water systems in Region 9. Drinking high levels of arsenic over many years can increase the chance of lung, bladder and skin cancers, heart disease, and neurological damage. On January 22, 2001, EPA reduced the MCL for arsenic from 50 parts per billion (ppb) to 10 ppb. To

¹ As of 2016, the respective national and Region 9 compliance rates with health-based drinking water standards are: 91.3% and 97.6% in for all PWSs; 89.8% and 88.7% for small PWSs; and 89.8% and 87.7% for very small PWSs.

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address the particular challenges faced by small systems, EPA made available compliance extensions of up to 14 years through an exemption process, which ended on January 23, 2015.

In December 2014, as the compliance deadline drew near, there were 242 small systems in Arizona, California, Nevada, Navajo Nation (collectively “primacy states”), and tribes under EPA’s SDWA direct implementation authority (“DI tribes”) with arsenic violations. In response, Region 9 initiated an enforcement effort to put non-compliant small systems “on a compliance pathway” (i.e. under an enforcement order with an enforceable “return to compliance” date). For arsenic MCL violations, “return to compliance” (“RTC”) means the system has been in compliance with the arsenic running annual average for at least four consecutive quarters.

Our initial effort yielded measurable results. As summarized in Figure 1 below, between January 2015 and August 2016, 101 (10%) systems (55% of the total noncompliant systems at the time) were on a compliance pathway, and 78 systems (30% of the total noncompliant systems) returned to compliance. The universe of small systems with arsenic issues is not static, however. Within that same period of time, 19 systems joined the noncompliant list. In addition, cases addressed or resolved during the initial enforcement effort tended to be more straightforward. As enforcement progresses, more challenging and time-consuming cases are expected.

Figure 1: Compliance Status of Small Systems for Arsenic MCL.²

Date	AZ	CA	NV	Navajo	DI Tribes	Total
1/2015: Systems in noncompliance	20	194	10	8	10	242
8/2016: Systems in noncompliance (new since 1/2015)	14 (1 new)	148 (15 new)	8 (1 new)	3	10 (2 new)	183 (19 new)
8/2016: Systems on compliance pathway	11	82	5	3	3	104 (101)

For FY17, Region 9 will continue to use enforcement as a key tool to drive arsenic reduction for the majority of noncompliant small systems, supplementing it with non-enforcement options (such as technical and financial assistance), especially for systems that may not be conducive to enforcement.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 1: Strengthen EPA oversight of primacy agencies’ enforcement responses and direct actions to accelerate small systems’ arsenic compliance.

Action 1A: Track primacy agencies’ enforcement responses to arsenic violations on a system-by-system basis to drive results. (Quarterly or more with CA, NV & Navajo Nation; monthly or more with AZ)

- Use a detailed, action-forcing tracking system and regularly scheduled meetings with primacy agencies to:
 - ✓ Verify systems’ adherence to required measures and milestones in the prior review period.
 - ✓ Prioritize enforcement action based on the systems: (1) noncompliance duration; (2) arsenic exceedance level; (3) overall profile of compliance, especially with health-based standards; and (4) size and vulnerabilities of populations served.
 - ✓ Confirm actions to put systems on an enforceable compliance schedule.
 - ✓ Review measures for interim sources of drinking water, especially for schools.
 - ✓ Explore non-enforcement tools to reduce arsenic exceedances.

² See Appendix I, Attachment A: List of Small Systems in Noncompliance with Arsenic MCL as of August 2016.

Action 1B: Initiate direct EPA enforcement response to compel compliance. (On-going)

- For DI Tribes: Prioritize actions based on the systems: (1) noncompliance duration; (2) arsenic exceedance level; (3) overall profile of compliance, especially with health-based standards; and (4) size and vulnerabilities of populations served.
- For Primacy States: Prioritize actions based on a primacy agency's referral or inability or unwillingness to put a system on a compliance pathway.

Action 1C: Enhance monitoring of compliance with active EPA orders.³

- Conduct regularly scheduled meetings with the system representative to ensure compliance with required corrective measures and milestones. (Quarterly or more)
- If the system fails to meet the order's requirements, take additional appropriate enforcement action (such as pursuing penalties or initiating an administrative or judicial action to enforce the order) (Ongoing)

STRATEGY 2: Use non-enforcement tools to reduce arsenic exposure, especially where enforcement is likely ineffective.

Action 2A: Encourage use of the Drinking Water State Revolving Fund (DWSRF) for long-term arsenic solutions, such as new water source, new treatment capacity, or consolidation with a larger PWS.

- Identify and track progress of systems slated to address arsenic through DWSRF-funded long-term solutions (Initial list for nine CA small systems completed;⁴ biannual updates)
- Work with primacy agencies to amplify innovative approaches to incentivize or require consolidation of systems that offer sustainable solutions to small communities' persistent exposure to arsenic in their drinking water.

MEASURES

- Increase small systems' "on a compliance pathway" rate from the current 55% to 80% by end of FY17.* (**This measure takes into account the dynamic nature of small systems' arsenic performance over time and the limitation of enforcement in some instances.*)
- Increase non-compliant system's "return to compliance" rate from the current 30% to 45% through FY17 and FY18 with a steady downward noncompliance trend.* (**This measure takes into account the varying "return to compliance" deadlines under different orders.*)
- Conduct outreach for all EPA enforcement actions.
- Conduct 2 outreach events to amplify innovations in arsenic reduction for overburdened communities.

OBJECTIVE II: Reduce Exposure to Lead in Small Systems' Drinking Water Supply

Exposure to lead from drinking water can have significant adverse impacts on human health. In children, low levels of exposure have been linked to damage to the nervous system, learning disabilities, impaired growth and hearing, and impaired blood cell formation and function. Under EPA's Lead and Copper Rule (LCR), if there are **action level exceedances or ALEs** for lead (i.e., when lead concentrations exceed an action level of 15 ppb in more than 10 percent of customer taps sampled), the system must undertake a number of additional actions including optimizing corrosion control treatment, notifying the public, and replacing portions of lead service lines controlled by the utility.

³ See **Appendix I, Attachment B**: List of Active EPA Orders, Milestones and Deadlines as of August 2016.

⁴ See **Appendix I, Attachment C**: List of Drinking Water State Revolving Fund Projects in California.

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In Region 9, small PWSs have a relatively high rate of compliance with the LCR. Out of the 3,940 small systems, 32 in Arizona and California have multiple historical ALEs, of which 13 are school PWSs. There are 44 small systems with current ALEs for lead in Arizona, California, Nevada, CNMI, and tribes, of which 12 are school PWSs.

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~~For~~In FY17, Region 9 will conduct ~~target~~targeted file reviews of ~~small PWSs~~ those with historical ALEs as the most effective way to determine if the primary agencies are properly implementing the LCR in their supervision of the drinking water systems, enhance engagements with primacy agencies to bring systems with current lead ALEs to below the action level, and provide ~~technical~~ training directly to states, utilities and technical assistance providers to improve corrosion control treatment.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 3: Enhance oversight of primacy agencies and small systems with historical or current lead ALEs to ensure timely and proper implementation of Lead and Copper Rule requirements.

Action 3A. Review primacy agencies' lead files⁵ of 17 small PWSs (8 in AZ and 9 in CA) with multiple historical lead ALEs⁶ to verify proper and timely implementation of LCR requirements. (This number ~~excludes~~ Excludes 13 school PWSs, addressed in Objective III.)

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8 file reviews in Arizona by March, 2017

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9 file reviews in California by June, 2017 (AZ: 3/31/17; CA: 6/30/17)

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- Conduct file review to determine if a primacy agency is making proper LCR compliance determinations for systems under its supervision and reporting accurate water system inventory and compliance data to EPA.
- Prepare written findings and recommendations
- Work with primacy agencies on a program improvement plan to address findings and recommendations.

Action 3B. Engage with primacy agencies to address 23 small PWSs (12 in AZ, 10 in CA, 1 in NV and 4 in Northern Mariana Islands)⁷ with current lead ALEs. (This number ~~excludes~~ Excludes 12 school PWSs, addressed in Objective III.)

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- ~~Conduct~~ Develop semiannual assessments status report of the 23 small systems. (3/31/17 March & September, 2017 & 9/30/17)
- ~~Follow up with increased~~ Increase primary agency oversight, requirements for enhanced reporting, and provide EPA technical assistance to help primacy agencies remedy ALEs.
- ~~Develop semiannual status report on efforts to be below the lead action level.~~ (3/31/17 & 9/30/17)

STRATEGY 4: Provide corrosion control treatment assistance to small PWSs and regulatory agencies in need.

Action 4A. Convene Corrosion Control Treatment Training

- Identify agencies or public water systems struggling with corrosion control treatment to participate in training (11/3-4/16 November, 2016).
- Convene training for states, technical assistance providers, and public water systems on the development and review of corrosion control treatment plans (11/3-4/16 November 2016).

MEASURES

- ~~Complete reports on file review~~ reports on the results for 17 small PWSs identified systems with multiple historical lead ALEs and engage with have primacy agencies to act on follow through with recommended improvements.
- Complete semiannual reports on the 23 small PWSs identified systems with current lead ALEs and increase primacy agency oversight to bring the systems' lead ALEs to level below the action level.

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⁵ See **Appendix II, Attachment A:** Region 9 Public Drinking Water System File Review Protocol.

⁶ See **Appendix II, Attachment B:** List of Small PWSs with Historical Lead ALEs.

⁷ See **Appendix II, Attachment C:** List of state and tribal PWSs with current ALEs

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- Convene 2 one-day corrosion control training workshops, with attendance by priority systems.
- Conduct public/media outreach for systems that achieve LCR compliance.

OBJECTIVE III: Improve Access to Safe Drinking Water in Schools

The EPA Office of Water's FY16-17 National Water Program Guidance emphasizes protecting populations at risk with a specific emphasis on children's health. Schools (including daycare facilities) may operate their own drinking water systems and be regulated as PWSs by the SDWA (School PWSs); or they may only be customers of PWSs and thus not subject to the SDWA.

There are 632 small School PWSs across Region 9, with current data showing 24 of them in California and on tribal lands as having arsenic exceedances, 13 in Arizona and California have as having historical lead ALEs, and 12 in Arizona, California, and Nevada have as having current lead ALEs. For these school PWSs, we will ensure provision of drinking water that meets the federal arsenic and lead requirements by employing a combination of enhanced oversight, enforcement, and technical assistance similar measures parallel to those for Objectives I and II, as well as emphasizing funding for alternative water if necessary.

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Most schools in Region 9 are located in buildings that receive their drinking water from PWSs. For these schools, sampling for lead in water from corroded pipes and fixtures is not required under the LCR.⁸ Many states, including California and Nevada, are establishing programs for testing and remediation of lead in school drinking water. We will work with primacy agencies to support adequate tap sampling and work with states and utilities to respond to ALEs for lead.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 5: Reduce children's exposure to arsenic in drinking water supplied by School PWSs or other small systems through enhanced oversight, enforcement, funding, and technical assistance, and funding.

Action 5A. Return School PWSs with arsenic exceedances⁹ to compliance through both enforcement and non-enforcement tools as discussed in Actions 1A through 1D above Objective I.

Action 5B. Leverage resources to return School PWSs with arsenic exceedances to compliance. (need to cross-walk with enforcement division. Since enforcement division is doing 52A – how does 5B fit into the picture?)

- Target National Technical Assistance grant funds to assist school PWSs with arsenic violations. (12/31/16 December, 2016)
- Work with primacy agencies to negotiate the terms of technical assistance provider work plans that focus on returning school PWSs to compliance. (12/31/16 January, 2017)
- Leverage Drinking Water State Revolving Funds to bring school PWSs with arsenic violations back into compliance. (XXX) June, 2017

Action 5C. Return community water suppliers of schools with arsenic exceedances to compliance through both enforcement and non-enforcement tools as discussed in Actions 1A through 1D above Objective I.

(Do we know which non-compliant CWSs are serving schools? How do we prioritize our enforcement action based on vulnerable populations if we don't have the info?)

⁸ The current LCR targets single family residences that are likely to have the highest risk for lead exposure. Many states, including California and Nevada, are establishing programs for testing and remediation of lead in school drinking water.

⁹ See Appendix I, Attachment A, for list of School PWSs with arsenic violations (in bold).

STRATEGY 6: Reduce children's exposure to lead in drinking water of School PWSs through enhanced oversight of primacy agencies or ~~monitoring and supporting tap sampling at schools served by PWSs.~~

Action 6A. Conduct file reviews of the 13 School PWSs (4 in AZ and 9 in CA) with multiple historical ALEs¹⁰ and verify proper implementation of LCR requirements. (~~Arizona by March, 2017; California by June, 2017~~~~AZ: 3/31/17; CA: 6/30/17~~)

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Action 6B. Ensure that the 12 School PWSs (4 in AZ, 7 in CA and 1 in NV) with current lead ALEs¹¹ receive interim provision of alternative water.

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- Determine whether interim alternative drinking water is provided to the 12 School PWSs with current lead ALEs. (~~11/01/16 – should already have happened – confirm and merge with next bullet?~~)
- Engage schools to provide alternative drinking water until the PWSs are in compliance with the LCR~~fall below the lead action level.~~ (~~XXDate~~)

Action 6C. Identify and address lead in school taps and fountains~~s~~ served by PWSs in primacy states.

The current LCR targets single family residences that are likely to have the highest risk for lead exposure; it does not require the PWSs to sample for lead in water from corroded pipes and fixtures in schools. However, many states, including (~~How about Arizona or its small systems plan?~~ California and Nevada, are establishing programs for testing and remediation of lead in school drinking water.

- **California:** Monitor state efforts under the school tap sample initiative and provide technical support for tap sampling of public schools. (~~xxxDate~~)
- **Nevada:** Oversee Nevada's testing for lead in 408 elementary and pre-K facilities via EPA's multi-purpose grant (\$89K) under the school tap sampling initiative. (~~xxxDate~~)

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Action 6D. Identify and address lead in school taps and fountains served by PWSs in DI tribes. (*See Objective IV for other actions to address safe drinking water in tribal communities*)

- Work with tribes to identify candidate schools for lead sampling, from approximately 150 that are served by DI regulated PWSs, based on ~~such factors as~~ age of facility and existence of prior sampling. (~~12/1/December, 2016~~)
- Develop a lead sampling strategy. (~~3/1/March, 2017~~)
- Develop a notification and quality assurance project plan for PWSs and tribal schools. (~~5/1/May, 2017~~)
- Conduct lead sampling in schools in coordination with tribal utilities by leveraging available resources (e.g., EPA's circuit rider). (Begin ~~7/1/July, 2017~~)
- Conduct additional oversight and engagement with utilities and schools where results are above the lead action level, including work with the tribe/utility/school to implement steps such as replacement of lead-containing materials in the school distribution system (fixtures, valves, internal plumbing), installation of treatment, finding/providing alternative water sources, and/or providing education/training. (Q4 of FY17 and FY18)

MEASURES

- All School PWSs with arsenic exceedances as of August 2016 are either on a compliance pathway, have returned to compliance, or are supplied with interim alternative water. [~~cross walk with enforcement division~~]
- ~~Complete file reviews and issue reports with recommendations for 13 school PWSs with historical ALEs.~~

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¹⁰ See **Appendix II, Attachment B**, for list of school PWSs with historical lead ALEs.

¹¹ See **Appendix II, Attachment C**, for list of school PWSs with current ALEs (in bold).

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- Verify compliance status of 13 school PWSs with multiple historical ALEs.
- Interim alternative drinking water is provided to all school PWSs with current lead ALEs, where not currently provided.
- Tap sampling in state and tribal schools served by PWSs is completed.
- Additional oversight is provided for PWSs serving schools where ALEs are detected.
- Kick-off event in schools with technical assistance providers.
- Organize and hold school tap sampling kick-off events in California and Nevada.
- Potential groundbreaking/press event for tribal drinking water infrastructure project(s).

OBJECTIVE IV: Improve Access to Safe Drinking Water in Tribal Communities

In Region 9, we directly regulate 321 tribal PWSs serving a population of about 477,000. Of the 321 systems, 97% are small systems with 90% classified as very small systems. Smaller water systems typically face more technical, managerial, and financial challenges in meeting SDWA standards than do larger water systems.

Region 9 receives two main sources of funding for tribal drinking water management and assistance. We receive funds for our direct oversight of the 321 systems which we typically use to provide direct technical and compliance assistance to tribal utilities (e.g., circuit riding services). We also receive drinking water infrastructure funding (tribal set-aside) that supports tribal projects such as water engineering studies, new wells, pipelines, and treatment facilities.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 7: Protect tribal communities from exposure to arsenic and lead in drinking water through enhanced oversight, enforcement, funding, and technical assistance.
Action 7A. Return the 10 tribal systems with current arsenic MCL violations¹² to compliance. <ul style="list-style-type: none">• Return the 10 non-compliant tribal systems (including 2 school PWSs) to compliance or put them on a compliance path with the arsenic MCL using a combination of Region 9 oversight, EPA-funded technical assistance, Drinking Water Tribal Set-Aside infrastructure funds and enforcement. (9/30/September, 2017)
Action 7B. Ensure the 5 tribal systems with current lead ALEs¹³ take timely actions to return to compliance with the LCR and bring the lead below the action level and have, if necessary, conduct EPA-approved optimal corrosion control treatment. (9/30/September, 2017)
Action 7C. Review 289 site sampling plans for adequacy and ability to ensure that each system has updated EPA-approved site sampling plans so that data collection is adequate to assess system compliance with national drinking water standards. <ul style="list-style-type: none">• Work with EPA-funded circuit rider and tribal utilities to ensure site sampling plans are current and compliant with the LCR, Revised Total Coliform Rule, and Disinfection Byproducts Rules. (50% of plans approved by 2/1/February, 2017; 90% of plans approved by 9/30/September, 2017)
MEASURES

¹² See **Appendix I, Attachment A**, for a list of tribal and tribal school (in bold) PWSs not in compliance for arsenic.

¹³ See **Appendix II, Attachment C**, for a list of tribal systems with lead ALEs.

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- Arsenic levels of the 10 identified tribal systems have are returned to compliance or are on a path to compliance with the arsenic MCL.
- Lead ALEs for the levels of 5 identified tribal systems are with lead ALEs have returned to compliance with the LCR below or are on the path to compliance be below the lead action level.
- 90% of tribal system sampling plans (289) are approved by end of FY17.
- Public outreach for all EPA enforcement actions.

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APPENDIX I (ARSENIC)

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Attachment A

Water Systems in Noncompliance with Arsenic MCL listed by State and Tribes (school PWSs in bold)

Arizona Water Systems in Noncompliance with Arsenic (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (mg/L)	Status
1	AZ0402033	Tombstone City of	Cochise	887	0.010	Under an enforceable compliance order. System is reworking its blending plan to address the arsenic MCL exceedances. New blending plan due to state by November 2017. Anticipated return to compliance date is 12/31/17.
2	AZ0404029	Jakes Corner Water System	Gila	35	0.012	Under an enforceable compliance order. System is planning to install treatment. Application fee for Approval to Construct (ATC) to state is due by 11/10/16.
3	AZ0407671	Peekaboo Water Coop	Maricopa	100	0.09	Under an enforceable compliance order System. The system's arsenic levels are currently below the arsenic.
4	AZ0407677	Valley View Water Company	Maricopa	60	0.010	Under an enforceable compliance order. Anticipated return to compliance date is 5/31/17.
5	AZ0408035	TRUXTON CANYON WATER COMPANY	Mohave	2126	0.013	Under an enforceable compliance order. System received SRF funding and completed its treatment construction. Anticipated return to compliance date is 1/31/17.
6	AZ0408149	WHITE HILLS WATER COMPANY UNIT 1	Mohave	46	0.010	Not under an enforceable compliance order. State assigned the system to a case manager for further follow-up and possible enforcement action.
7	AZ0411557	NEW SADDLEBACK VISTA DWID	Pinal	129	0.011	Under an enforceable compliance order. Arsenic treatment has been installed. Awaiting for the System's RAA to be below the MCL. Anticipated return to compliance date is 12/31/17.
8	AZ0413038	LAKE VERDE WATER COMPANY	Yavapai	125	0.010	Under an enforceable compliance order. System is on the SRF project list for funding. System is currently under construction for arsenic treatment. Estimated completion date for construction

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Arizona Water Systems in Noncompliance with Arsenic (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (mg/L)	Status
						is 2/7/17. Anticipated return to compliance date is 4/30/18.
9	AZ0413425	Rio Verde RV Park	Yavapai	213	0.048	Under an enforceable compliance order. State recently revised the order. State to reclassify this system from a CWS to TNC.
10	AZ0414018	TACNA Water Management Company	Yuma	240	0.024	State is drafting a compliance order for the system's new owners. State is working with system to develop technical options. The system can consolidate with Mohawk Utility or install treatment.
11	AZ0411100	Thunderbird Farms DWID	Pinal	1600	0.010	Under an enforceable compliance order. On track to meet 10/30/16 deadline for completion of construction (treatment). Anticipated return to compliance date is June 2017.
12	AZ0414098	Sierra Pacific Mobile Man	Yuma	816	0.023	Under an enforceable compliance order. Construction is substantially complete. Awaiting for the lab analytical results and system's RAA to be below the MCL. Anticipated return to compliance date is 12/31/17.
13	AZ0415023	Wenden DWID	La Paz	750	0.011	Under an enforceable compliance order. USDA funding for treatment was approved. Anticipated construction completion date of treatment system is June 2017. Alternative water may be served in the interim.
14	AZ0415038	Bouse Worley Water System	La Paz	190	0.01	Under an enforceable compliance order. A private system that has raised its utility rates. State is working with system to develop technical options, including treatment.
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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
1	CA0600008	Colusa Co. W.D. #1 - Grimes	Colusa	500	24.0	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
2	CA0707602	Beacon West	Contra Costa	45	27	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
3	CA0707615	Doubletree Ranch HOA	Contra Costa	49	21.5	Under enforceable compliance order. Anticipated return to compliance by July 2017.
4	CA0900102	Gold Beach Park	El Dorado	100	12	Under enforceable compliance order. Anticipated return to compliance date is unknown. System not complying with compliance order.
5	CA1000053	Lanare CSD	Fresno	400	13; 19.3	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
6	CA1000071	Lakeview Improvement Assoc.	Fresno	64	27.5; 19.3	Under enforceable compliance order. Anticipated return to compliance by July 2017.
7	CA1000072	Shaver Lake Pt. No. 2	Fresno	210	4.5; 38; 28.8	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
8	CA1000369	Zonneveld Dairy	Fresno	141	17.6; 9.1	Not under enforceable compliance order. Anticipated return to compliance by September 2016. Bottled water or hauled water is being provided to customers.
9	CA1000584	True Organic Products	Fresno	42	15.5	Under enforceable compliance order. Anticipated return to compliance by December 2016.
10	CA1000602	Baker Commodities	Fresno	60	6.3	Not under enforceable compliance order. Anticipated return to compliance by December 2016. System is currently serving MCL-compliant water.

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
11	CA1000604	Johann Dairy	Fresno	60	29	Under enforceable compliance order. Anticipated return to compliance by April 2019.
12	CA1009051	Cantua Creek Vineyards	Fresno	50	31.3	Under enforceable compliance order. Anticipated return to compliance by July 2017. Bottled water or hauled water is being provided to customers.
13	CA1010039	Caruthers CSD	Fresno	2103	10; 10.7	Not under enforceable compliance order. Anticipated return to compliance by March 2018.
14	CA1400036	Keeler CSD	Inyo	180	65	Under enforceable compliance order. Anticipated return to compliance by July 2018.
15	CA1500378	Maher Mutual Water Company	Kern	192	16	Under enforceable compliance order. Anticipated return to compliance by June 2018.
16	CA1500424	Land of Promise Mutual Water Association	Kern	190	17	Under enforceable compliance order. Anticipated return to compliance by May 2018.
17	CA1500426	Rosa Villa Apartments	Kern	47	10	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water.
18	CA1500436	Hungry Gulch Water System	Kern	33	77	Under enforceable compliance order. Anticipated return to compliance by April 2018.
19	CA1500442	Sunset Apartment Water System	Kern	37	42	Under enforceable compliance order. Anticipated return to compliance by August 2018.
20	CA1500449	Fourth Street Water System	Kern	56	18	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
21	CA1500455	William Fisher Memorial Water Company	Kern	53	22	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
22	CA1500458	RS Mutual Water Company	Kern	67	10	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water.
23	CA1500461	Fountain Trailer Park Water	Kern	68	89	Not under enforceable compliance order. Anticipated

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
						return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
34	CA1500485	Antelope Valley Mobile Estates	Kern	49	8	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water.
25	CA1500493	El Adobe Property Owners Association, Inc.	Kern	200	20	Not under enforceable compliance order. Anticipated return to compliance by June 2018.
26	CA1500521	Boulder Canyon Water Association	Kern	28	19	Under enforceable compliance order. Anticipated return to compliance by April 2018.
27	CA1500525	Lakeview Ranchos Mutual Water	Kern	120	43	Under enforceable compliance order. Anticipated return to compliance by March 2018.
28	CA1500571	Lucky 18 on Rosamond, LLC	Kern	147	30	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
29	CA1500585	Oasis Prop Owner Assoc.	Kern	100	11	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
30	CA1502383	Nord Road Water Association	Kern	39	13	Under enforceable compliance order. Anticipated return to compliance by June 2018.
31	CA1502569	First Mutual Water System	Kern	35	30	Under enforceable compliance order. Anticipated return to compliance by May 2018.
32	CA1502620	Pond MWC	Kern	48	14	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
33	CA1502724	Quail Valley Water District-Eastside System	Kern	60	88	Under enforceable compliance order. Anticipated return to compliance by April 2018.
34	CA1502744	60th Street Association Water System	Kern	44	11	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
35	CA1510001	Arvin CSD	Kern	11847	31	Under enforceable EPA compliance order. Anticipated return to compliance by March

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
						2019. Bottled water or hauled water is being provided to customers.
36	CA1510002	Boron Community Services District	Kern	2500	38	Under enforceable compliance order. Anticipated return to compliance by March 2018.
37	CA1510012	Lamont PUD	Kern	13296	10.1	Not under enforceable compliance order. Anticipated return to compliance by December 2016. System is currently serving MCL-compliant water.
38	CA1510016	Rand Communities Water District	Kern	450	19	Under enforceable compliance order. Anticipated return to compliance by March 2018.
39	CA1510024	Greenfield CWD	Kern	6500	11	Under enforceable compliance order. Anticipated return to compliance by June 2018.
40	CA1510052	North Edwards Water District	Kern	600	32	Not under enforceable compliance order. Anticipated return to compliance by May 2018.
41	CA1600050	Central Valley Meat	Kings	280	36	Under enforceable compliance order. Anticipated return to compliance by January 2019. Bottled water or hauled water is being provided to customers.
42	CA1600601	Kings Waste Recycling Authority	Kings	45	91	Under enforceable compliance order. Anticipated return to compliance by January 2019. Bottled water or hauled water is being provided to customers.
43	CA1600605	Baker Commodities	Kings	47	28	Under enforceable compliance order. Anticipated return to compliance by January 2018. Bottled water or hauled water is being provided to customers.
44	CA1610009	Kettleman City CSD	Kings	1499	15	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
45	CA1900038	Lancaster Park Mobile Home Park	Los Angeles	53	15	Not under enforceable compliance order. Anticipated return to compliance by October 2016.
46	CA1900100	Mettler Valley Mutual	Los Angeles	100	13	Not under enforceable compliance order. Anticipated

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
						return to compliance by October 2016.
47	CA1900520	The Village Mobile Home Park	Los Angeles	70	45	Not under enforceable compliance order. Anticipated return to compliance by October 2016.
48	CA1900785	Mitchell's Avenue Mobile Home Park	Los Angeles	26	21	Not under enforceable compliance order. Anticipated return to compliance by July 2017.
49	CA1900961	Winterhaven Mobile Estates	Los Angeles	40	51	Not under enforceable compliance order. Anticipated return to compliance by October 2016.
50	CA1910246	Land Projects Mutual Water Company	Los Angeles	1500	12.5; 14.5; 10.82	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Referred to EPA for enforcement escalation.
51	CA2000506	Sierra Linda	Madera	180	27	Under enforceable compliance order. Anticipated return to compliance by June 2018.
52	CA2000527	Yosemite Forks Estates	Madera	110	17	Under enforceable compliance order. Anticipated return to compliance by June 2018.
53	CA2000534	Leisure Acres	Madera	45	8.7	Under enforceable compliance order. Anticipated return to compliance by June 2018. System is currently serving MCL-compliant water.
54	CA2000538	Cedar Valley Mutual	Madera	137	17	Under enforceable compliance order. Anticipated return to compliance by June 2018.
55	CA2000550	MD 6 Lake Shore	Madera	130	79; 97	Under enforceable compliance order. Anticipated return to compliance by June 2018. Bottled water or hauled water is being provided to year-round customers.
56	CA2000551	MD 7 Marina View Heights	Madera	200	13	Under enforceable compliance order. Anticipated return to compliance by June 2018.
57	CA2000552	MD 24 Teaford Meadows	Madera	150	16	Under enforceable compliance order. Anticipated return to compliance by June 2018.

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
58	CA2000561	MD 8 North Fork	Madera	264	13	Under enforceable compliance order. Anticipated return to compliance by June 2018.
59	CA2000619	Cold Spring Granite	Madera	43	11; 16.2	Under enforceable compliance order. Anticipated return to compliance by June 2018.
60	CA2000737	MD 42 Still Meadows	Madera	100	18; 14	Under enforceable compliance order. Anticipated return to compliance by June 2018.
61	CA2000866	Agriland Farming	Madera	190	11.5	Under enforceable compliance order. Anticipated return to compliance by June 2018.
62	CA2010007	Hillview Water Company-Oakhurst/Sierra Lakes	Madera	3006	12.5	Under enforceable compliance order. Anticipated return to compliance by July 2018.
63	CA2010012	Hillview Water Company-Raymond	Madera	290	21.0	Under enforceable compliance order. Anticipated return to compliance by July 2018.
64	CA2010801	Valley State Prison	Madera	4000	9.95; 7.8; 7.2; 3.35	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water.
65	CA2210937	Mariposa County Public Works Dept	Mariposa	135	17.0	Under enforceable compliance order. Anticipated return to compliance by November 2016. Bottled water or hauled water is being provided to customers.
66	CA2400165	Foster Farms Delhi Feedmill	Merced	200	15.75	Under enforceable compliance order. Anticipated return to compliance by February 2018.
67	CA2400170	Hilmar Cheese Company	Merced	1000	4.7	Under enforceable compliance order. Anticipated return to compliance by December 2016. System is currently serving MCL-compliant water.
68	CA2600622	Sierra East MHP	Mono	50	42; 81	Not under enforceable compliance order. Anticipated return to compliance by July 2018.
69	CA2610003	Bridgeport PUD	Mono	3000	34	Under enforceable compliance order. Anticipated return to compliance by April 2018.
70	CA2700612	Laguna Seca WC	Monterey	162	10.5	Under enforceable compliance order. Anticipated return to compliance by March 2018.

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
71	CA2700702	Prunedale MWC	Monterey	252	10	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
72	CA2700799	Vista Del Toro WS	Monterey	87	20	Under enforceable compliance order. Anticipated return to compliance by March 2018.
73	CA2701296	Moro Rd. #9 WS	Monterey	210	19	Under enforceable compliance order. Anticipated return to compliance by March 2018.
74	CA2701959	Tierra Vista MWC	Monterey	57	11	Under enforceable compliance order. Anticipated return to compliance by March 2018.
75	CA2702009	Laguna Seca Rec WS	Monterey	500	16	Under enforceable compliance order. Anticipated return to compliance by March 2018.
76	CA2702030	Cypress Community Church WS	Monterey	200	16	Under enforceable compliance order. Anticipated return to compliance by March 2018. Bottled water or hauled water is being provided to customers.
77	CA2702051	Corral de Tierra Estates WS	Monterey	45	76	Under enforceable compliance order. Anticipated return to compliance by March 2018.
78	CA3210011	Plumas Eureka CSD	Plumas	339	10.4	Under enforceable compliance order. Anticipated return to compliance by November 2017.
79	CA3301380	Saint Anthony Trailer Park	Riverside	300	21	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
80	CA3303092	Mecca Arco Travel Center	Riverside	47	27	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
81	CA3303100	Oasis Gardens Water Company	Riverside	314	11	Under enforceable compliance order. Anticipated return to compliance by January 2018.
82	CA3400103	B & W Resort	Sacramento	100	33	Under enforceable compliance order. Anticipated return to compliance by July 2018.
83	CA3400130	Courtland Group	Sacramento	40	10	Under enforceable compliance order. Anticipated return to compliance by July 2018. System is currently serving MCL-compliant water.

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
84	CA3400138	Locke Waterworks	Sacramento	65	28	Under enforceable compliance order. Anticipated return to compliance by July 2018.
85	CA3400149	Rancho Marina MHP	Sacramento	75	33	Under enforceable compliance order. Anticipated return to compliance by July 2018. Bottled water or hauled water is being provided to customers.
86	CA3400164	Vieira's Resort	Sacramento	150	25.75; 28.5	Under enforceable compliance order. Anticipated return to compliance by July 2018.
87	CA3400332	Oxbow Marina	Sacramento	90	27	Under enforceable compliance order. Anticipated return to compliance by July 2018.
88	CA3400433	Edgewater MHP	Sacramento	35	36	Under enforceable compliance order. Anticipated return to compliance by July 2018.
89	CA3600025	Bar-Len MWC	San Bernardino	200	17.25	Under enforceable compliance order. Anticipated return to compliance by December 2019.
90	CA3600036	Calico Ghost Town	San Bernardino	1000	22.25	Under enforceable compliance order. Anticipated return to compliance by December 2019.
91	CA3600062	Caillier Water System	San Bernardino	100	48	Under enforceable compliance order. Anticipated return to compliance by December 2019.
92	CA3600196	CSA 70 W-4 Pioneertown	San Bernardino	410	112.5	Under enforceable EPA compliance order. Anticipated return to compliance by June 2017. Bottled water or hauled water is being provided to customers.
93	CA3600504	Knoll Enterprises	San Bernardino	500	28.25	Not under enforceable compliance order. Anticipated return to compliance by December 2019.
94	CA3601015	Ironwood Camp	San Bernardino	1000	31.75	Under enforceable compliance order. Anticipated return to compliance by December 2019.
95	CA3610705	US Army Fort Irwin National Training Center	San Bernardino	16000	32	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
96	CA3900579	Century Mobile Home Park	San Joaquin	50	14; 14	Not under enforceable compliance order. Anticipated

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
						return to compliance by December 2016.
97	CA3901213	Avalos, Silvia	San Joaquin	30	13; 13	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
98	CA3901334	BJJ Company LLC	San Joaquin	40	17; 17	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
99	CA4000637	Country Hills Estates	San Luis Obispo	81	27	Under enforceable compliance order. Anticipated return to compliance by July 2018.
100	CA4600019	Sierra Co. W.W.D #1 Calpine	Sierra	225	21.5	Under enforceable compliance order. Anticipated return to compliance by November 2016.
101	CA4800561	Snug Harbor Resort	Solano	32	16	Under enforceable compliance order. Anticipated return to compliance by April 2018.
102	CA4900575	Loch Haven Mutual Water Company	Sonoma	50	12.5	Under enforceable compliance order. Anticipated return to compliance by July 2017.
103	CA4900643	Mount Weske Estates Mutual Water Company	Sonoma	62	50.5	Under enforceable compliance order. Anticipated return to compliance by July 2017.
104	CA4900676	Sequoia Gardens Mobile Home Park	Sonoma	300	6.2	Not under enforceable compliance order. Anticipated return to compliance by December 2016. Bottled water or hauled water is being provided to customers. System is currently serving MCL-compliant water.
105	CA5000033	Coble's Corner	Stanislaus	50	13	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
106	CA5000051	Mobile Plaza Park	Stanislaus	125	12	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
107	CA5000077	Ceres West MHP	Stanislaus	161	20	Under enforceable compliance order. Anticipated return to compliance by April 2018.

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
108	CA5000085	Green Run Mobile Estates	Stanislaus	100	14	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
109	CA5000086	Countryside MH Estates	Stanislaus	60	11	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
110	CA5000218	Country Villa Apts.	Stanislaus	30	22	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
111	CA5000308	B&H Manufacturing	Stanislaus	90	8	Under enforceable compliance order. Anticipated return to compliance by March 2017. Bottled water or hauled water is being provided to customers. System is currently serving MCL-compliant water.
112	CA5000389	Monterey Park Tract CSD	Stanislaus	186	32	Not under enforceable compliance order. Anticipated return to compliance by September 2016. Bottled water or hauled water is being provided to customers.
113	CA5000465	Duarte Nursery	Stanislaus	75	6	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
114	CA5000484	United Pallet	Stanislaus	45	12	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
115	CA5000498	Patchetts Ford Mercury	Stanislaus	35	10	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
116	CA5000570	Valley Peterbilt	Stanislaus	25	11	Under enforceable compliance order. Anticipated return to compliance by January 2018. Bottled water or hauled water is being provided to customers.
117	CA5010008	City of Hughson	Stanislaus	6082	11.0	Under enforceable compliance order. Anticipated return to compliance by July 2018.

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
118	CA5010009	Keyes CSD	Stanislaus	4891	15.0	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
119	CA5100107	Sutter County WWD#1 (Robbins)	Sutter	350	16.5	Under enforceable compliance order. Anticipated return to compliance by December 2018.
120	CA5200550	New Orchard MHP	Tehama	100	20.75	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
121	CA5201137	Millstream MHP	Tehama	118	20.75	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
	CA5210003	Los Molinos Comm. Services District	Tehama	1500	10.5	Under enforceable compliance order. Anticipated return to compliance by July 2018.
22	CA5403054	PFFJ, LLC	Tulare	87	75; 58	Under enforceable compliance order. Anticipated return to compliance by March 2018. Bottled water or hauled water is being provided to customers.
123	CA5410009	Pixley PUD	Tulare	2793	19	Under enforceable compliance order. Anticipated return to compliance by June 2018.
124	CA5410024	Richgrove Community Services	Tulare	3330	7	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System is currently serving MCL-compliant water.
125	CA5410050	Alpaugh JPA	Tulare	1091	7	Under enforceable compliance order. Anticipated return to compliance by May 2018. System is currently serving MCL-compliant water.
126	CA5700514	Bogle Winery	Yolo	40	12.5	Not under enforceable compliance order. Anticipated return to compliance by January 2017. Bottled water or hauled water is being provided to customers. LPA planning to issue new compliance order by July 2016.
127	CA5700652	Yolo Fliers Club	Yolo	410	10.0	Not under enforceable compliance order. Anticipated return to compliance date is

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
						unknown. System is currently serving MCL-compliant water.
128	CA5700778	Yolo County Central Landfill	Yolo	40	11.0	Not under enforceable compliance order. Anticipated return to compliance by September 2016.
129	CA5800805	Lake Francis Mutual Water Company	Yuba	27	10.8	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
130	CA0900210	Millers Hill School	El Dorado	120	8.9	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers. System is currently serving MCL-compliant water.
131	CA1502154	Lakeside School	Kern	800	17	Not under enforceable compliance order. Anticipated return to compliance by December 2017. Bottled water or hauled water is being provided to customers.
132	CA1502231	Rosamond School Water System	Kern	900	11	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
133	CA1600008	Central Union School	Kings	320	13; 11	Under enforceable compliance order. Anticipated return to compliance by July 2019.
134	CA1600048	Kettleman City Elementary	Kings	350	12.25	School on bottled water.
135	CA2000150	Liberty High School	Madera	1340	42	Under enforceable compliance order. Anticipated return to compliance by August 2018.
136	CA2000612	North Fork Union School	Madera	350	13	Under enforceable compliance order. Anticipated return to compliance by June 2018.
137	CA2000785	Valley Teen Ranch	Madera	50	54	Under enforceable compliance order. Anticipated return to compliance by June 2018. Bottled water or hauled water is being provided to customers.

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
138	CA2701221	Washington School	Monterey	250	25	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
139	CA2702550	Grange Hall WS	Monterey	25	57	Under enforceable compliance order. Anticipated return to compliance by March 2018. Bottled water or hauled water is being provided to customers.
140	CA3701010	Warner Unified School District	San Diego	250	10.6	Under enforceable compliance order. Anticipated return to compliance by March 2017. Bottled water or hauled water is being provided to customers.
141	CA3901169	MSUD-Nile Garden School	San Joaquin	804	23; 23	Not under enforceable compliance order. Anticipated return to compliance by December 2016.
142	CA4000774	Pleasant Valley Elementary	San Luis Obispo	150	16	Not under enforceable compliance order. Anticipated return to compliance by July 2017. Bottled water or hauled water is being provided to customers.
143	CA5000273	Gratton School	Stanislaus	110	13	Not under enforceable compliance order. Anticipated return to compliance date is unknown.
144	CA5100145	Winship Elementary School	Sutter	38	15.5	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Bottled water or hauled water is being provided to customers.
145	CA5100149	Barry Elementary School	Sutter	560	14.9	Under enforceable compliance order. Anticipated return to compliance by May 2018. Bottled water or hauled water is being provided to customers.
146	CA0706028	Knightesen Elementary School	Contra Costa	350		Returned to compliance (7/28/2016). High arsenic well inactivated.
147	CA1300556	Mulberry Union School	Imperial	85		Returned to compliance (9/18/2015). Switched to surface water source.

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California Water Systems in Noncompliance with Arsenic						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (ug/L)	Status
148	CA2700552	Echo Valley School	Monterey	503		Returned to compliance 3/29/2013. Treatment installed.
149	CA3400371	Arcohe Elementary School	Sacramento	465		Returned to compliance 3/9/2016. Levels below arsenic MCL.
	Total	149				

Nevada Systems in Noncompliance with Arsenic (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (mg/L)	Status
1	NV0000149	Desert Paradise MHP	Clark	70	0.016	Under enforceable compliance order. Bottled water is being provided. Anticipated return to compliance date is unknown.
2	NV0000298	LaMoille Valley Plaza	Elko	25	0.023	Not under enforceable compliance order. State issued a Notice of Formal Enforcement in April 2016. Anticipated return to compliance date is unknown. POUs installed, but not tested. Private company may purchase this system.
3	NV0000319	Roark Estates Water Assoc	Clark	62	0.026	Not under enforceable compliance order. State issued a Notice of Formal Enforcement in April 2016. SRF funded POU treatment installation completed in August 2016. Return to compliance anticipated in September 2016.
4	NV0005028	Shoshone Estates Water Co. Inc.	Nye	240	0.030	Not under enforceable compliance order. State issued a Notice of Formal Enforcement in April 2016. Board has been responsive and POUs are planned. Anticipated return to compliance date is unknown.
5	NV0000058	Wildes Manor	Churchill	70	0.017	Under enforceable compliance order. Owner has been

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						unresponsive. Bottled water is being provided. Anticipated return to compliance date is unknown.
6	NV0004012	Silver Knolls Mutual Water Co	Washoe	120	0.011	Under enforceable compliance order. Treatment installed. Awaiting additional sampling events to determine whether system meets RAA requirements.
7	NV0000147	Frontier Village	Clark	60	0.09	Under enforceable compliance order. Notice of formal enforcement in June 2016. Treatment was installed. Awaiting final confirmation from state that system is in full compliance.
8	NV0000303	Old River	Churchill	300	.035	Under enforceable compliance order. POU's installed at all connections. Awaiting additional sampling events to determine whether system meets RAA requirements. Anticipated return to compliance is December 2016.
	Total	8		947		

Navajo Water Systems in Noncompliance with Arsenic (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)						
#	PWS ID	PWS Name	County	Pop	Arsenic RAA (mg/L)	Method (SRF new source, treatment, consolidation)
1	NN3503028	Toadlena - NTUA	San Juan County, New Mexico	914	0.015	Under enforceable compliance order. Anticipated return to compliance date is December 2017. Toadlena plans to blend with Narbona Pass water system (PWS ID NN-350301). Physical intertie completed. System awaits installation of 3-phase power.
2	NN-3503057	Mittenrock - NTUA	San Juan County, New Mexico	363	0.0093	Returned to Compliance. Mittenrock water system intertied with the NTUA – Sanostee/Tocito water system (PWS ID NN-3503059).
3	NN4900220	Aneth - NTUA	San Juan County, Utah	1297	0.010	Under enforceable compliance order. Anticipated return to compliance date is June 2018.

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						NTUA to construct arsenic treatment plant. NTUA applied to USDA for approximately \$1.9M for treatment system.
4	NN-4903017	Red Mesa - NTUA	San Juan County, Utah	958	0.0096	Returned to compliance. USEPA, IHS, and ARRA funds were used to build Sweetwater Pipeline that pipes surface water from the Farmington Rural Water System (PWS ID NN-35300145).
5	NN4903018	Montezuma Creek - NTUA	San Juan County, Utah	414	0.023	Under enforceable compliance order. Anticipated return to compliance date is June 2018. NTUA to construct arsenic treatment plant. Has applied to USDA for 6 approximately \$1.9M for treatment system.
6	NN-4903071	Todahaidekane - NTUA	San Juan County, Utah	292	0.0111	Pipeline break in 2015 resulted in return to use of high arsenic level wells. Wells were blended with Farmington surface water via Sweetwater pipeline. Most recent As levels <10 ppb.
7	NN-4903072	Mexican Water - NTUA	San Juan County, Utah	337	0.0133	Pipeline break in 2015 resulted in return to use of high arsenic level wells. Wells were blended with Farmington surface water via Sweetwater pipeline. Most recent As levels <10 ppb. Await additional sampling to provide RAA <10 ppb.
8	NN-0436006	Dileon Boarding School - BIA	Navajo, Arizona	473	0.0102	School on bottled water. BIA constructed treatment plant online on 9/18/2015. Experiencing difficulties with acid adjustment.
	Total			2625		

Tribal DI Water Systems in Noncompliance with Arsenic (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)						
#	PWS ID	PWS Name	Tribe Name	Pop	Arsenic RAA (mg/L)	Status
1	090400106	Polacca	Hopi	2600	0.017	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System under enforcement review by EPA.
2	090400107	Sipaulovi (Lower Sipaulovi/Lower Mishongnovi)	Hopi	523	0.017	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System under enforcement review by EPA.
3	090400218	San Miguel CBP	Tohono O'odham Nation	113	0.011	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System under enforcement review by EPA.

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4	090400237	SCUA Soda Canyon	San Carlos Apache	185	0.065	Under enforceable compliance order. Alternative water to be served at system. Anticipated return to compliance date is September 2018.
5	090400259	Shungopavi	Hopi	1500	0.013	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System under enforcement review by EPA.
6	090400260	Hopi Cultural Center	Hopi	325	0.012	Under enforceable compliance order. Anticipated return to compliance date is 2020. The tribe plans to install a point of entry system as an interim compliance measure. Bottled water is being served.
7	090400394	Mishongnovi (Upper Sipaulovi/ Upper Mishongnovi)	Hopi	450	0.017	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System under enforcement review by EPA.
8	090400662	BIA San Carlos Forestry	San Carlos Apache	50	0.015	Not under enforceable compliance order. Anticipated return to compliance date is unknown. System under enforcement review by EPA.
9	090403011	Dzil Libei (Cameron) Elementary School	Navajo	133	0.040	Not under enforceable compliance order. Anticipated return to compliance date is unknown. Bottled water is being served. System under enforcement review by EPA.
10	090400395	Hopi High School - BIA	Hopi	1150		Under enforceable compliance order. Anticipated return to compliance date is September 2017. The system is currently serving compliant water.
	Total	10				

Attachment B

Region 9 Arsenic SDWA Enforcement Actions as of August 2016							
	System	City, State	Population	Arsenic level at the time of the enforcement action	Enforcement action (NOV, AOC, Order) and date	Interim measures	Date system should meet the MCL
1	Arvin CSD	Arvin, CA	20,000	11-30 ppb	CA/FO w/penalty and AOC	Free water/ vending machines	March 2019
2	Hopi Cultural Center	Hopi Tribe	25, Hotel, café, Non-Comm. system	12 ppb	AOC	POU/POE	June 2020
3	Torres Martinez	Torres-Martinez Tribe	266	14 ppb	AOC	Returned to compliance (RTC) in 2015.	RTC in 2015, Consolidation.

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4	Pioneertown	Pioneertown, CA	377	50-79 ppb	AOC	Hauled water	Jan. 2017
5	SCUA Soda Canyon	San Carlos Apache Tribe	185	65 ppb RAA (current level)	AOC	<i>EPA and Tribe in discussions to establish an enforceable RTC schedule.</i>	<i>EPA and Tribe in discussions to establish an enforceable RTC schedule.</i>
Total		5					

Attachment C

Drinking Water State Revolving Fund Arsenic Projects in California						
	PWS ID	County	PWS Name	Project Description	Total Commitment	Milestone
1	CA1500426	Techachapi	Rosa Villa Apartments	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	DWSRF/Prop 84 Total: \$1.5M	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
2	CA1500485		Antelope Valley Mobile Estates	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	DWSRF/Prop 84 Total: \$1.5M	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
3	CA1500571		Lucky 18 on Rosamond, LLC	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	DWSRF/Prop 84 Total: \$1.5M	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
4	CA1502231		Rosamond School Water System	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	DWSRF/Prop 84 Total: \$1.5M	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
5	CA1502569		First Mutual Water System	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	DWSRF/Prop 84 Total: \$1.5M	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
6	CA1502744		60th Street Association Water System	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	DWSRF/Prop 84 Total: \$1.5M	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.

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7	CA5010008	Stockton	City of Hughson	Project to provide arsenic treatment, new storage and distribution facilities.	SDWSRF and/or Prop 1 Total Cost: \$6.6M	Funding agreement to be issued early 2017.
8	CA5010009	Stockton	Keyes CSD	New arsenic treatment plant + consolidation of 4 small PWSs: - Countryside Mobile Home Estates (CA5000086) - Green Run Mobile Estates (CA5000085) - Mobile Plaza Mobile Home Park, (CA5000051) - Faith Home Teen Ranch (CA5000217) (nitrate violation)	DWSRF /Prop 1 Total: \$18.8M	Construction funding agreement expected to be issued XXX Project completion: 2018
9	CA5210003	Valley	LOS MOLINOS COMM. SERVICES DIST.	Project for new well source and transmission line to consolidation New Orchard MHP (CA5200550) and Millstream MHP (CA5201137).	DWSRF Total Cost: 1.4M	Construction funding agreement expected to be issued by December 2016.
Total		9				

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APPENDIX II (LEAD)

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Attachment A

Region 9 Public Drinking Water System File Review Protocol

(version 10/13/2016)

Objective

To determine whether the primacy agency for the Public Water System Supervision (PWSS) Program is making proper rule compliance determinations and reporting water system inventory and compliance data accurately to the EPA for making appropriate decisions to protect public health.

Background

File reviews generally accompany a comprehensive **program review**, where EPA evaluates the performance of primacy agency PWSS program management and implementation to include program administration, development, technical assistance and training, enforcement, and data management. However, EPA may choose to conduct standalone file reviews as a primacy agency oversight tool.

The Safe Drinking Water Act requires primacy agencies to report required public water system (PWS) information to EPA each quarter. EPA maintains the information in the national Safe Drinking Water Information System (SDWIS) database. SDWIS includes inventory information for each public water system (name, population served, system type, source characteristics) and violation information (failures to follow monitoring and reporting schedules, meet mandated treatment techniques or MCLs, or notify consumers, and related enforcement information).

File Review Process

Identify PWSs	Stratified random sample set or targeted sample set
Review files	Compare information in water system files against pre-populated EPA regional data capture forms with data retrieved from SDWIS
Document findings	<p>Identify type of data discrepancies (inventory/compliance)</p> <p>Categorize type of discrepancies</p> <ul style="list-style-type: none">- Inaccurate (inventory only): system-specific inventory information not recorded accurately in the primacy agency database.- Compliance determination under-reporting: Primacy agency or EPA determines a water system to be in violation but the violation is not recorded in the primacy agency database- Compliance determination over-reporting: a water system file shows no valid violation yet a violation is recorded in the primacy agency database.- Data flow: federally required data recorded in primacy agency database does not migrate successfully to SDWIS/Fed
Prepare report	Document, evaluate and assess findings. Provide EPA recommended actions. Work with primacy agency to address file review findings and prioritize EPA recommended actions for follow up in a program improvement plan.

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Attachment B

Arizona Small PWSs with Historical Lead ALEs as of June, 2016			
#	PWS ID	PWS Name	No. of historical multiple ALEs or 2 consecutive ALEs over the past 7 years
1	AZ0411705	ADOC Eyman Unit	2
2	AZ0410092	Marana Municipal – Picture Rocks	2
3	AZ0413108	Sedona Venture Water Company	2
4	AZ0414009	Valley Vista Water Company	2
5	AZ0412306	Mountain View Campground	2
6	AZ0402112	Naco Water Co – Bisbee	2
7	AZ0404037	Town of Star Valley Water Department	2
8	AZ0415096	Q Mountain Water Company	2
9	AZ0410264	THIM ater Corp 2	2
10	AZ0409013	Porter Creek DWID	2
11	AZ0415120	Parker South	2
12	AZ0410207	THIM Utility Corporation - VFW	2
13	AZ0402063	Cochise Jr College	2
14	AZ0414105	Orange Grove Elementary School	2
15	AZ0413095	Oak Creek Elementary School	2
16	AZ0409046	Holbrook SDA Indian School	2

California Small PWSs with Historical Lead ALEs as of June, 2016			
#	PWS ID	PWS Name	No. of historical multiple ALEs or 2 consecutive ALEs over the past 12 years
1	CA2300644	Woodside RV Park	3+
2	CA3610026	SBDNO County Service Area 70 Cedar Glen	3+
3	CA3610707	USN San Clemente Island	3+
4	CA4200854	Imerys Minerals California Inc	3+
5	CA4900508	Cazadero Water Company, Inc	2 consecutive
6	CA5400701	Sequoia Crest Water Company	3+
7	CA5400934	Ponderosa CSD	3+
8	CA1010501	NPS-Grant Grove – Fresno District (23)	2 consecutive
9	CA4300779	Lakeside SD-Lakeside School	3+
10	CA5400624	Kings River Elementary School	3+
11	CA5400795	Waukena Elementary School	3+
12	CA1000112	Fairmont School	3+
13	CA1000276	Orange Center School	3+
14	CA1000315	Clay Joint Elementary School	3+
15	CA5800843	MJUSD Foothill Intermediate School	3+
16	CA5800845	MJUSD Dobbins School	3+
17	CA5800847	MJUSD Loma Rica School	3+

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Attachment C

Arizona Small PWSs with current ALEs for Lead (school PWSs in bold)						
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)						
#	PWS ID	PWS Name	Pb90 mg/L	Pop	County	Status
1	AZ0402112	Naco WC-Bisbee	0.0047	201	Cochise	Expect Pb90<AL to be posted 3/31/2017. 6-month sampling completed and Pb90<AL. State reports partial WQP monitoring done.
2	AZ0404869	USDS TNF Grapevine Campground	.04	30	Gila	Expect Pb90<AL to be posted 3/31/2017. Await second round of 6-month sampling, 1 st round Pb90<AL. State reports partial WQP monitoring done.
3	AZ0409013	Porter Creek DWID	.07	300	Navajo	Expect Pb90<AL to be posted 3/31/2017. Await second round of 6-month sampling, 1 st round Pb90<AL. State reports partial WQP monitoring done.
4	AZ0410093	Sandario Water Co.	.023	1062	Pima	Expect Pb90<AL to be posted 3/31/2017 Await second round of 6-month sampling, 1 st round <Pb90 AL.
5	AZ0411328	Copper Mtn Ranch	0.0164	909	Pinal	Expect Pb90<AL to be posted 3/31/2017 Await second round of 6-month sampling, 1 st round Pb90<AL.
6	AZ0412306	Mtn view Campground	0.024	145	Santa Cruz	Expect Pb90<AL to be posted 3/31/2017 Await second round of 6-month sampling, 1 st round Pb90 ND. State reports partial WQP monitoring done.
7	AZ0413108	Sedona Venture Water Co.	0.0654	700	Yavapai	Expect Pb90<AL to be posted 3/31/2017 Await second round of 6-month sampling, 1 st round Pb90<AL. WQP monitoring completed.
8	AZ0414009	Valley Vista Water	0.0154	300	Yuma	Expect Pb90<AL to be posted 3/31/2017 Await second round of 6-month sampling, 1 st round Pb90<AL. Partial WQP monitoring done.
9	AZ0414448	Sunset MHP	0.0261	43	Yuma	Expect Pb90<AL to be posted 3/31/2017 Await second round of 6-month sampling, 1 st round Pb90<AL. Partial WQP monitoring done.
10	AZ0415120	Parker South	0.1	45	La Paz	Expect Pb90<AL to be posted 3/31/2017 Await second round of 6-month sampling, 1 st round Pb90<AL.
11	AZ0407072	Taliesin West	ND	85	Maricopa	Below Pb90 AL. Two 6-month sampling completed Pb90<AL.
12	AZ0407900	Sontel Trust Water Co-op	ND	80	Maricopa	Below Pb90 AL. PWS had ALE in 2013 but normal 2014 sampling was zero

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13	AZ0409046	Holbrook SDA Indian School		109	Navajo	PWS to complete a CCT study via third-party TA contractor. PWS has posted signs to flush water/fountains and sinks that have elevated lead.
14	AZ0413095	Oak Creek Elementary		250	Yavapai	School on bottled water for past 2 years. PWS to complete a CCT study via third-party TA contractor. School plans to re-plumb building.
15	AZ0414105	Orange Grove Elementary		425	Yuma	PWS to complete a CCT study via third-party TA contractor. PWS has shut off water to classrooms and ordered filters. Custodians and/or teachers flush the water system prior to students' arrival.
16	AZ0407178	Paloma School District 94		125	Maricopa	School on bottled water during Treatment Plant failure, no potable water was delivered to school and all sampling was suspended. CCT project has been approved by ADEQ in 2013. 1st round of 6-month Pb90 results = 0.0018 mg/L
Total		16		3900		

California Small PWSs with current ALEs for Lead (school PWSs in bold)					
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)					
#	PWS ID	PWS Name	Pb90	Pop	Status
1	CA0707573	DELTA MUTUAL WATER COMPANY	0.054	225	Below Pb90 AL. Data transmission error.
2	CA1000324	Manning Gardens Care Center Inc	0.026	144	Earliest possible PB<AL to be posted 3/31/2017 PWS being placed on six-month monitoring
3	CA1500465	Oak Knolls Mutual Water Co	0.045	135	Earliest possible PB<AL to be posted 3/31/2017 Resampling showed all results below lead action level. System not returned to standard monitoring. Many homes not occupied by the year round residents.
4	CA20000659	CBUSO Mission Bell	0.020	440	Expect Pb90<AL to be posted 9/31/2016. System sampled on June 9, 2016 and all sample results were below the AL. They are scheduled to complete a second round before December 31st, 2016. The System completed Public Education (PE) and is on the path to full compliance.
5	CA2000681	Certainfeed	0.078	150	Earliest possible PB<AL to be posted 3/31/2017 System changed out the lead faucet fixtures. Sampling in June 2016. System not returned to standard monitoring. The system notified consumers of the exceedance.
6	CA2000865	MD#58 Sierra Highland	0.020	75	Earliest possible PB<AL to be posted 3/31/2017 System sampled on 8/17/16 and 8/23/16. Results

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					below the AL. Await next round of samples within 6 months.
7	CA4901144	Cohn Winery	0.02	55	Earliest possible PB<AL to be posted 3/31/2017 ALE on 1/26/2016. 1 st round collected July 2016. Await results.
8	CA4901345	Buckley Family Partnership	0.023	45	Earliest possible PB<AL to be posted 9/31/2016 ALE on 12/22/2015. Await results of six-month set collected on 6/24/2016.
9	CA5200525	North Valley Services	0.174	30	Below Pb90 AL. Data transmission error. Pb90 is 12.4ug/L.
10	CA5402050	Milk Specialties Global	0.019	60	Earliest possible PB<AL to be posted 3/31/2017 Bottled water being provided. 6-month samples collected August 2016.
11	CA1900750	Del Sur School/Westside Union District		920	Not on bottled water. ALE on 3/22/16. Second set of 20 samples taken 4/2014 was <AL. 90th percentile to be recalculated.
12	CA4300779	Lakeside SD-Lakeside School		110	School on bottled water. Corrosion control study due 3/2017.
13	CA5000116	Roselawn High		223	Not on bottled water. State compliance order to be issued.
14	CA5400795	Waukena Elementary School		230	School on bottled water. Taps locked. System pursuing new source due to nitrate and uranium.
15	CA5601405	Santa Clara School		59	School on bottled water. ALE in 1998 - 0.555. Old school with lead pipes. On annual monitoring. Lead pipes mainly used for hand-washing.
16	CA5800845	MJUSD Dobbins School		85	Not on bottled water. System under state compliance order. Most recent 90th percentile is 0.0157. Recommend File Review
17	CA5800847	MJUSD Loma Rica School		150	Not on bottled water. 9/14/2015 ALE = 0.023. Three other ALEs since 2004.
	Total	17			

Nevada Small PWSs with current ALEs for Lead (school PWSs in bold)					
(August 2016 SDWIS Fed Data Warehouse -- data reported through June 30, 2016)					
#	PWS ID	PWS Name	County	Pop	Status
1	NV0001103	Marigold Mine Potable Water System	Humboldt	300	Expect Pb90<AL to be posted 3/31/2017. Replaced galvanized piping/shut off valves in March 2016. Initial WQP sampling conducted. Recent sampling (5/5/2016) = 14 ppb. Expect to meet AL with next sampling.
	NV0001045	Goodsprings School	Clark	300	Not on bottled water. Fountains have been locked. Recent sampling (4/28/16) showed lead <AL at 13.6 ppb. Investigating faucet replacements. Expect to meet AL with next sampling.
	Total	2		600	

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Northern Mariana Island Small PWSs with current ALEs for Lead (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)					
#	PWS ID	PWS Name	County	Pop	Status
1	MP	Anaks Condominium		191	Expect Pb90<AL to be posted 3/31/2017 PWS does not have 2 six-month samples below AL yet. First sample taken in July 2016 was below AL.
2	MP	Aqua Resort Hotel		514	Expect Pb90<AL to be posted 3/31/2017 PWS does not have 2 six-month samples below AL yet. First sample taken in July 2016 was below AL.
3	MP	Hyatt Hotel Staff Housing		77	Expect Pb90<AL to be posted 3/31/2017 ALE in Aug. 2013. PWS was back in compliance in Dec. 2013. Primacy agency overlooked putting PWS on 6-month monitoring. PWS took 1 st 6-month sample in July 2016 which was below AL.
4	MP	Finasisu Terrace Apartment/Tan Holdings		393	Below Pb90 AL. ALE in 2011. Below AL in 2013. Monitoring for two consecutive 6-month periods in 2014 showed levels below AL.
	Total	4			

Tribal DI Small PWSs with current ALEs for Lead (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)					
#	PWS ID	PWS Name	Tribe Name	Pop	Status
1	09-0402057	Kitt Peak National Observatory	Tohono O'odham Nation	80	Conducting CCT study
2	09-0605158	Camp Casino (Golden Acorn Casino)	Campo	1000	Changed out fixtures, still above AL; CCT now installed and monitoring is ongoing
3	09-0605164	Big Valley Rancheria Water District	Big Valley Band	3135	Conducting CCT study with FY16 DWTS funds
4	09-0605128	Round Valley Administration Complex	Covelo Indian Community	100	CCT deemed optimized
5	09-3200161	Washoe Tribe Carson Colony	Washoe	450	On increased monitoring
	Total	5		4,765	

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